IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MEIRAV KESHER HADADI, LTD.,	
Plaintiff and Counter-defendant,)	Case No. 07C7282
v.) ZIPCAR INC., MOBILITY INC. d/b/a)	The Honorable John W. Darrah, Judge Presiding
FLEXCAR and I-GO,	Magistrate Judge Denlow
Defendants and Counter-plaintiffs.)	

JOINT MOTION TO AMEND THE SCHEDULING ORDER

Plaintiff Meirav Kesher Hadadi, Ltd. and defendants Zipcar Inc., Mobility Inc. d/b/a Flexcar and I-GO (collectively, "Zipcar"), by their attorneys, hereby jointly request that the Court amend the scheduling order entered by the Court (the "Scheduling Order"). In support of this joint motion, the parties state as follows:

- 1. On March 27, 2008, the parties appeared before the Court for an initial status conference.
- 2. The parties agreed to an amendment of the Scheduling Order which was granted by the Court on April 10, 2008.
- 3. The parties respectfully propose moving each of the dates in the Scheduling Order back (approximately) 30 days, as they believe that such an amendment would facilitate a meaningful effort to resolve the case at this time.
- 4. The parties therefore respectfully request that the Scheduling Order should be amended to read as follows:

Event	<u>Date</u>
Parties to exchange Rule 26(a)(1) disclosures	Completed

<u>Event</u>	<u>Date</u>	
Parties to exchange list of claim limitations in dispute	June 2, 2008	
Parties to exchange proposed constructions of claim limitations in dispute and identify extrinsic evidence to support such constructions	July 1, 2008	
Parties to file joint claim construction chart listing proposed constructions and identifying any extrinsic evidence parties intend to use with respect to claim construction	July 30, 2008	
Parties to file opening claim construction briefs	August 27, 2008	
Parties to file responsive claim construction briefs	September 23, 2008	
Parties to file reply briefs to responsive claim construction briefs	October 8, 2008	
Status conference and ruling regarding claim construction	At the Court's convenience	
Parties to amend pleadings to join additional parties	October 31, 2008	
Fact discovery to be completed	January 16, 2008 (all discovery must be initiated to be completed by this date)	
Parties to serve expert reports for any issue on which a party carries the burden of proof	February 19, 2009	
Parties to serve rebuttal expert reports	March 18, 2009	
Expert discovery to be completed	April 17, 2009	
Parties to file dispositive motions	June 12, 2009	
Parties to file responses to dispositive motions	July 10, 2009	
Parties to file reply briefs to responses to dispositive motions	July 24, 2009	
Status conference	At the Court's convenience	
Parties to file pretrial order	October 15, 2009	
Pretrial conference	At the Court's convenience	
Trial	At the Court's convenience	

5. The parties are submitting a joint proposed order for electronic entry in accordance with the Court's Standing Order.

WHEREFORE, the parties respectfully request that the Court grant the parties' Joint Motion to Amend the Scheduling Order.

Dated:		2008
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ZIPCAR INC., MOBILITY INC. D/B/A FLEXCAR AND I-GO

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